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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ANIBAL GEOFANNI FILIPPI, individually,

Case No.: 2:24-cv-01905-APG-EJY

**Plaintiff.**

VS.

JERALD YOUNG THOMPSON, individually;  
RMD TRUCKING, INC., a foreign corporation;  
DOES I through X, inclusive and ROE  
CORPORATIONS I through X, inclusive,

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY (First Request)**

## Defendants.

Plaintiff Anibal Geovanni Filippi (“Filippi”), and Defendants Jerald Young Thompson (“Thompson”) and RMD Trucking, Inc., (“RMD”), (collectively “the Parties”), by and through their counsel of record, hereby submit their Stipulation to Extend Discovery by ninety (90) days in accordance with Local Rule 26-3 and Local Rule IA 6-1.

This is the Parties' first request for an extension of time to extend the current discovery plan and counsel submits that the request is brought in good faith, is supported by good cause in compliance with LR 26-3, and is not intended to cause delay.

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1           **A. Statement Specifying the Discovery Completed:**

2           The Parties submitted their proposed Joint Discovery Plan on November 21, 2024 [ECF  
3 No. 11]. The Scheduling Order was subsequently entered on November 21, 2024 [ECF No. 12].

4           To date, the Parties have completed the following discovery:

- 5           • Defendants' Initial Disclosure of Witnesses and Documents was served on  
6           November 19, 2024;
- 7           • Defendants' First Set of Requests for Production of Documents to Plaintiff was  
8           served on November 21, 2024;
- 9           • Defendants' First Set of Interrogatories to Plaintiff was served on November 21,  
10           2024;
- 11           • Plaintiff's Initial Disclosure of Witnesses and Documents was served on  
12           December 3, 2024;
- 13           • Defendants noticed the deposition of Plaintiff on January 7, 2025;

14           **B. Specific Description of the Discovery that Remains to be Completed:**

15           The Parties need to conduct the following discovery:

- 16           • Plaintiff will respond to the written discovery propounded by Defendants, due  
17           January 20, 2025;
- 18           • Plaintiff will serve discovery on the Defendants;
- 19           • Plaintiff will take the deposition of Defendant Thompson;
- 20           • Plaintiff will take the deposition of the Fed. R. Civ. P. 30(b)(6) Witness(es) for  
21           Defendant RMD;
- 22           • Defendants will take the deposition of Plaintiff Filippi, currently scheduled for  
23           January 31, 2025;
- 24           • The Parties' Initial Expert Disclosures;
- 25           • The Parties' Rebuttal Expert Disclosures;
- 26           • Deposition of various fact witnesses and experts; and
- 27           • Such other discovery that may be deemed necessary or appropriate.

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1           C. **The Reasons why the Deadline was not Satisfied, or the Remaining Discovery was**  
 2           **not Completed Within the Time Limits set by the Discovery Plan:**

3           The Parties have been diligent in conducting discovery since discovery commenced in this  
 4           matter. The parties have found that more time is needed to schedule remaining discovery and  
 5           retain experts in advance of the pending February 10, 2025, deadline. For these reasons, the  
 6           Parties agree to the ninety-day extension.

7           D. **A Proposed Schedule for Completing all Remaining Discovery.**

8           The Parties request that the current deadlines in the Scheduling Order [ECF No. 12] be  
 9           extended as follows:

- 10           1. Last Day to Amend Pleadings or Add Parties: currently Thursday, January 9, 2025,  
                  **desired Wednesday, April 9, 2025;**
- 11           2. Last Day to Disclose Initial Expert Reports: currently Monday, February 10, 2025,  
                  **desired Monday, May 12, 2025;**
- 12           3. Last Day to Disclose Rebuttal Experts: currently Friday, April 11, 2025, **desired**  
                  **Thursday, July 10, 2025;**
- 13           4. Last Day to Complete Discovery: currently Wednesday, April 9, 2025, **desired**  
                  **Tuesday, July 8, 2025;**
- 14           5. Last Day to File Dispositive Motions: currently Friday, May 9, 2025, **desired**  
                  **Thursday, August 7, 2025;** and

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1           6. Last Day to File Joint Pre-Trial Order: currently Monday, June 9, 2025, **desired**  
2           **Monday, September 8, 2025.** In the event dispositive motions are filed, the date for  
3           filing the joint pretrial order shall be suspended until thirty (30) days after a decision  
4           of the dispositive motions or until further order from the court. The disclosures  
5           required by FRCP 26(a)(3), and any objections thereto, shall be included in the pretrial  
6           order.

7           IT IS SO STIPULATED.  
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9           DATED this 10<sup>th</sup> day of January 2025.

10          THE702FIRM INJURY ATTORNEYS

11          */s/ Matthew P. Pawlowski*

12          Michael C. Kane, Esq.  
13          Nevada Bar No. 10096  
14          Bradley J. Myers, ESQ.  
15          Nevada Bar No.: 8857  
16          Matthew P. Pawlowski, Esq.  
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20          *Attorneys for Plaintiff Anibal Filippi*

DATED this 10<sup>th</sup> day of January 2025.

WINNER & BOOZE

*/s/ Christine M. Booze*

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Las Vegas, Nevada 89102  
*Attorneys for Defendants*  
*Jerald Young Thompson and RMD Trucking*

21          IT IS SO ORDERED.

22          Dated this 10th day of January, 2025.

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25          UNITED STATES MAGISTRATE JUDGE  
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